STATEMENT OF BASIS FOR
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) WASTE DISCHARGE PERMIT No. WA 0040932
Clark Public Utilities (River Road Generating Plant)

FACILITY GENERAL INFORMATION:

Applicant	Clark Public Utilities
Facility Name and Address	River Road Generating Project 5201 NW Lower River Road Vancouver, WA 98660
Industry Type	Gas fired power plant with steam recovery
SIC Code	4911
Facility Discharge Location	Columbia River @ River Mile 103.2 Latitude: 45º 38' 38" N Longitude: 122º 43' 46" W
Water Body ID Number	1240014462974
Responsible Official	Name: Jack R. Anderson, P.E. Telephone: 360-992-3060 Fax: 360-992-3091 email: janderson@clarkpud.com

BACKGROUND INFORMATION

On September 17, 2008, the Department of Ecology (Ecology) received a letter from Jack R. Anderson, Clark Public Utilities (CPU), clarifying CPU's understanding of requirements contained in the NPDES permit:

Item 1 - Section S2, A.2, on Page 8 of 28 Cooling Tower, Internal Waste Stream table and on Page 9 of 28 in footnote "a" on the table at the top of the page. The monitoring for priority pollutants references 157 priority pollutants described and shown in EPA application form2C. ***We have confirmed with you that the footnote should refer to the 126 Priority Pollutants adopted by EPA in 40 CFR part 423 and listed on Attachment A.***

Item 2 - Section S1, A.2, on Page 6 of 28 Discharge from the Cooling Tower Limitations, Internal Waste Stream table, in footnote "c" on the table at the top of the page. The method for metals (except Mercury), listed is GFAA detector Method. ***We have confirmed with you that the EPA approved methods and quantification levels for NPDES program should be used, as shown on http://www.ecy.wa.gov/pubs/92109.pdf, Table VI-3 starting on page VI-60 and 'shown as Attachment B.***

Ecology has reviewed CPU's understanding of requirements contained in the NPDES permit and proposes to modify the permit as follows:

Item 1—the reference to the 157 priority pollutants is removed from footnote "a" and the priority pollutants are defined as the 126 priority pollutants in 40 CFR part 423 Appendix A.

Item 2—The Environmental Protection Agency approved sampling and analytical methods and quantification levels listed on http://www.ecy.wa.gov/pubs/92109.pdf, are based on 40 CFR part 136; therefore reference to this federal regulation is placed in footnote "c". The most sensitive methods shall be used to analyze for the priority pollutants contained in chemicals added for cooling tower maintenance.

On January 13, 2009, Ecology received another letter from Mr. Anderson requesting a credit for pollutants in the intake water. Ecology grants the request providing that each time any priority pollutants (except zinc and chromium) are detected in the cooling tower discharge CPU submits a report. The report shall demonstrate the following:

1. The priority pollutants detected in the discharge would not be detected in the absence of these pollutants in the intake waters.

2. The discharge meets water quality criteria for all detected priority pollutants.